

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Bankruptcy Matter of:

Heidi Brown-Polk

Debtor

Bankruptcy No. 19-02277  
Judge LaShonda A. Hunt  
Chapter: 13

**NOTICE OF MOTION**

TO: Heidi Brown-Polk, 932 E. 46th St., Chicago, IL 60653  
Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604  
Jordan TraVaille Hoffman, Jordan TraVaille Hoffman, P.C., 2711 E. New York St., Suite 205, Aurora, IL 60502  
Patrick S Layng, Office of the U.S. Trustee, Region 11, 219 S Dearborn St, Room 873, Chicago, IL 60604

Please take notice on November 18, 2019 at 9:30 a.m., I shall appear before the Honorable LaShonda A. Hunt, in Courtroom 719, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, and present the attached motion at which time you may appear if you wish.

/s/ Josephine J. Miceli

Josephine J. Miceli, ARDC #6243494

**CERTIFICATE OF SERVICE**

I, Josephine J. Miceli, an attorney certify that I served the attached motion by mailing a copy to the Debtor at the address listed above by depositing the same in the U.S. mail, first class, postage prepaid at 230 W. Monroe, Chicago, IL 60606 on or before 5:00 p.m. on October 30, 2019. The remaining parties were served by the CM/ECF electronic noticing system.

/s/ Josephine J. Miceli

Josephine J. Miceli, ARDC #6243494

Josephine J. Miceli  
Johnson, Blumberg, & Associates, LLC  
230 W. Monroe Street, Suite 1125  
Chicago, Illinois 60606  
Ph. 312-541-9710  
Fax 312-541-9711

**NOTICE:**

THIS LAW FIRM IS ATTEMPTING TO COLLECT A DEBT AND ANY  
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE

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**MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

NOW COMES Select Portfolio Servicing, Inc. as servicing agent for Deutsche Bank National Trust Company, as Trustee, in trust for registered Holders of Long Beach Mortgage Loan Trust 2006-WL2, Asset-Backed Certificates, Series 2006-WL2 (hereinafter "Movant"), through its attorney, Josephine J. Miceli of Johnson, Blumberg & Associates, LLC, and states as follows:

1. The Movant, a party in interest, holds a Mortgage dated June 24, 2005 on the property located at 932 E 46th Street, Chicago, Illinois 60653, in the original amount of \$299,900.00. (A copy of the Note, Mortgage, Assignment and Loan Modification are attached as Exhibit A, B, C and D respectively and incorporated herein by reference).
2. The above-captioned Chapter 13 case was filed on January 27, 2019 and the Debtor's Plan was confirmed on June 17, 2019.
3. The confirmed plan provides for the Debtor to be the disbursing agent for the post petition mortgage payments and the Chapter 13 Trustee to be disbursing agent for the pre-petition arrearages.
4. As of October 18, 2019, the Debtor has failed to maintain post-petition payments thereby accruing a default of 9 payments from February 1, 2019 through October 1, 2019 for a post-petition arrearage total of \$12,920.85. A summary of the post-petition arrearage is as follows:

February 1, 2019 to October 1, 2019, 9 payments at \$1,435.65 each

5. The Movant adopts the facts set forth in the Statement of Default as additional allegations in support of this motion.
6. The Movant has no adequate protection in that the Debtor is in material default of the terms of the Plan by not making the required payments to the Movant and there is little or no equity in the property.
7. That should the Debtor wish to reinstate while under the jurisdiction of this Court, Movant requests to be reimbursed for the costs and attorney fees of filing this motion.
8. That Movant is entitled to relief pursuant to 11 U.S.C. 362(d).
9. The Movant requests waiver of 14 day stay provision of Bankruptcy Rule of Procedure 4001(a)(3).

WHEREFORE, Select Portfolio Servicing, Inc. as servicing agent for Deutsche Bank National Trust Company, as Trustee, in trust for registered Holders of Long Beach Mortgage Loan Trust 2006-WL2, Asset-Backed Certificates, Series 2006-WL2 prays for the entry of an order modifying, annulling or terminating the Automatic Stay instantler to allow foreclosure, eviction, or any other action with respect to the Movant protecting its rights in the subject property as the Court deems appropriate and for such other relief as the Court deems just.

/s/ Josephine J. Miceli

Josephine J. Miceli, ARDC #6243494  
Attorney for Select Portfolio Servicing, Inc. as  
servicing agent for Deutsche Bank National Trust  
Company, as Trustee, in trust for registered  
Holders of Long Beach Mortgage Loan Trust  
2006-WL2, Asset-Backed Certificates, Series  
2006-WL2

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